

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

RETAIL GROUND AND PARCEL SELECT GROUND
SERVICE STANDARD CHANGES, 2022

Docket No. N2022-1

**CONSENT MOTION OF THE UNITED STATES POSTAL SERVICE
TO ACCELERATE THE PROCEDURAL SCHEDULE**

(April 19, 2022)

The United States Postal Service, with the consent of the Public Representative and in accordance with the Stipulation and Agreement between the Postal Service and the Public Representative, filed on April 14, 2022, hereby respectfully moves the Commission as follows:

1. On March 21, 2022, in accordance with 39 U.S.C. § 3661(b), the Postal Service filed its Request for an Advisory Opinion on Changes in the Nature of Postal Services (Request) seeking to upgrade the service standard for Retail Ground and Parcel Select Ground in the contiguous United States from the current two- to eight-day standard to a two- to five-day standard.

2. On March 15, 2022, in accordance with Rule 3020.111, the Postal Service conducted a pre-filing conference with respect to the planned service standard changes.

3. On March 23, 2022, the Postal Regulatory Commission (Commission) issued Order No. 6124 that, among other things, established the procedural schedule for these proceedings.

4. Order No. 6124 provided, in part, that a Technical Conference would be held in this proceeding on March 31, 2022. In addition, Order No. 6124 required all parties interested in attending the Technical Conference to pre-register by March 28, 2022.

5. On March 29, 2022, the Commission issued Order No. 6129 cancelling the Technical Conference scheduled for March 31, 2022, because no parties other than the Postal Service and Commission staff (including the Public Representative) had registered for the conference and no one had requested to speak or provided questions.

6. In accordance with the procedural schedule established by Order No. 6124, all parties seeking to intervene in this docket were required to file notice thereof by April 4, 2022. As of the filing of this motion, no party has sought to intervene.

7. On April 14, 2022, the Postal Service and the Public Representative stipulated and agreed, among other things, that (i) no further discovery requests or testimony would be filed in this proceeding unless requested by the Commission; and (ii) neither a hearing nor oral argument or examination are necessary in determining whether the planned service standard changes for RG and PSG, as described in this Docket, are in accordance with the policies of Title 39 of the United States Code and in furtherance of the public interest.

8. In the same agreement, the Postal Service agreed to move to accelerate the procedural schedule established by Order No. 6124.

9. Given the absence of third parties participating in these proceedings, the Postal Service urges the Commission to expedite resolution of the Request. The Postal Service accordingly recommends expedition of certain aspects of the proceeding. Given

that there are no intervening parties and the nature of the proposal in question, the Postal Service expects the need for hearings to be eliminated and briefing and preparation of an advisory opinion would be expected to be less labor intensive than prior cases. To that end, the Postal Service respectfully requests that the Commission accelerate the current procedural schedule as follows:

<u>Event</u>	<u>Current</u>	<u>Modified</u>
Deadline for Discovery Requests	4/18	4/18
Deadline for Discovery Responses	4/25	4/25
Notice of Designations	4/26	4/26
Filing Notice of Designated Materials	4/29	4/27
Initial Brief	5/11	5/11
Statements of Position	5/11	5/11
Reply Brief	5/18	5/13

10. As reflected in the Stipulation and Agreement, the Public Representative consents to these proposed dates.

11. The accelerated schedule presumes cancellation of the hearing currently scheduled to begin May 2, 2022, given that there are no intervening parties and that the Public Representative has agreed to forgo oral cross-examination. Should the Commission nonetheless prefer hearings be held for its own purposes, the Postal Service stands ready to offer an alternative schedule.

12. The Public Representative authorizes the Postal Service to represent that it consents to this motion.

WHEREFORE, the Postal Service respectfully requests that the Commission grant this Motion and modify the procedural schedule as requested.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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